

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

)	
GOLDEN BETHUNE-HILL, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	
)	Civil Action No. 3:14-cv-852
VIRGINIA STATE BOARD OF)	
ELECTIONS, <i>et al.</i> ,)	
)	
Defendants,)	
)	
)	

**INTERESTED PARTY VIRGINIA STATE CONFERENCE OF NAACP BRANCHES
RESPONSE TO COURT’S NOVEMBER 15, 2018 ORDER**

Pursuant to this Court’s Order of November 15, 2018, ECF 298, requiring Interested Party Virginia State Conference of NAACP Branches (“the Virginia NAACP”) to submit a new block equivalency file for its proposed remedy plan that is formatted as a simple text file instead of an excel spreadsheet, the Virginia NAACP respectfully notifies the Court that it has, today, via overnight FedEx, sent a hard copy CD-ROM containing the Shapefiles and text file Block Equivalency files to the Court, the parties, and the Department of Legislative Services. That file is in a folder labeled “Files Requested by Court on November 15 2018.”

In addition to amended file requested by the Court on November 15, 2018, the Virginia NAACP also submitted, on that same hard copy CD-ROM, an adjusted remedial plan for the Court’s consideration that uses the corrected census block data. As the Virginia NAACP stated in its Notice to Court on Friday, November 16, 2018, ECF 303, counsel for the Virginia NAACP

discovered an error relating to the data for two census blocks (Block 51710 0038.001000 and Block 51710 0009.02 1044) located in the Norfolk area in Districts 79 and 89. The Virginia NAACP was able to correct this technical Census Bureau error in the Virginia NAACP's proposed remedial plan by making minor adjustments to only those two districts. These limited corrections are provided to the Court in a second folder on the same hard copy CD-ROM, labeled "NAACP Plan with Census Block Issue Corrected." Maps and statistical information about these two corrected districts are attached as Exhibits A, B, and C. Exhibit D contains a notice from the Census Bureau acknowledging the census block assignment error.¹

The Virginia NAACP respectfully requests that the Court consider the Virginia NAACP's amended districts in the Norfolk area, designed to address the corrections issued by the Census Bureau. In the alternative, should the Court not accept this amended plan, the Virginia NAACP respectfully requests that the Court and special master consider the rest of the proposed remedial plan timely submitted by the Virginia NAACP on November 2, 2018, ECF 286.

Submitted this 19th day of November, 2018.

/s/ David O. Prince

David O. Prince (VA State Bar # 17044)
411 East Franklin Street
Richmond, VA 23219
Telephone: 804-873-2601
Email: princelaw@aol.com

Allison Riggs (admitted *pro hac vice*)
Jeff Loperfido (admitted *pro hac vice*)
SOUTHERN COALITION FOR SOCIAL JUSTICE
1415 W. Highway 54, Suite 101
Durham, N.C. 27707
Telephone: (919) 323-3380
Facsimile: (919) 323-3942
Email: allisonriggs@southerncoalition.org
Email: jeffloperfido@scsj.org

¹ This notice is also available at https://www.census.gov/rdo/pdf/VA_errata.pdf.

Counsel for the Virginia NAACP

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of November, 2018, I have electronically filed the foregoing document with the Clerk of Court using the United States District Court, Eastern District of Virginia, Richmond Division, CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record, including Plaintiffs, Defendants, and Defendant-Intervenors.

/s/ David O. Prince
David. O. Prince, Esquire
VSB # 17044
411 East Franklin Street
Richmond, VA 23219
804-788-4861
princelaw@aol.com